

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products
Liability Litigation

No. MD-15-02641-PHX-DGC

**[PROPOSED] PRETRIAL ORDER
NO. _____
(SUPPLEMENTAL DEPOSITIONS)¹**

With the agreement of the parties, the court hereby ORDERS that:

Each party not present or represented at a deposition (including parties later added and parties in cases subsequently filed in, removed to, or transferred to this court) may, for good cause shown and at the sole discretion of this Court, within 30 days after the filing of the deposition (or, if later, within 60 days after becoming a party in this court in any action that is a part of this litigation), request permission to conduct a supplemental deposition of the deponent, including the right to take such deposition telephonically and by nonstenographic means. If permitted, the deposition shall be treated as the resumption of the deposition originally noticed; and each deponent shall, at the conclusion of the initial deposition, be advised of the opportunity of nonattending parties to request a resumption of such deposition, subject to the right of the deponent to seek a protective order. Such examination shall not be repetitive of the prior interrogation.

¹ The language of this Order is drawn substantially from the Manual for Complex Litigation, Fourth § 40.29 ¶ 13.

SO ORDERED this ____ day of December, 2015.

David C. Campbell, Judge

1
2
3
4
5
6
7
8
9
0
1
2
3
4